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From: chad@wi organi cs. com%i nter2 [chad@wi organi cs. com] on behal f of
chad@wi organi cs. com

Sent: Thursday, February 17, 2005 9:33 AM

To: Torres, Francine

Cc: bruce@wi organi cs. com%i nter2

Subject: Public comment on Grazi ng

Attachments: ATTACHMENT. TXT

Dear NOSB Chai rman Ji m Ri ddle,

I represent an organi c dai ry processi ng company working wi th Wi sconsi n fami ly farms
and marketi ng organi c dai ry products under the brand name Wi sconsi n Organi cs.

I want to express full support for the recent Livestock Committee Pasture
Requirement recommendations. Enforcement of true access to pasture is necessary so
that all organic ruminants receive a significant, and legally mandated, portion of
their total feed intake from pasture. This includes an allowance of only narrowly
defined, short-term ("temporary") exceptions to pasture. I strongly agree that
lactation is not a "stage of production" during which dairy cows may be denied
pasture for grazing. I urge the NOSB to recommend specific wording be added to the
Pasture Rule to keep this type of abuse from continuing to occur.

Pasture is an essential component of organic dairy production from many
perspectives:

a.. For the health and promotion of the natural behavior of the cow

a.. Respecting the perspective of the consumer and their belief that organic milk
is produced by cows having legitimate access to pasture

a.. Assuring the consumer's right to the extra nutritional advantage provided by
grazing cows

a.. Acknowledgement of the many environmental benefits provided by pasture,
including lower energy use (avoidance of machine-intensive systems of animal feed
delivery and manure disposal), reduced soil erosion and the protection of water and
air quality.

I further support the additional recommendations including:

1. That the pasture definition be further refined such that "pasture" is land
managed to maintain or improve soil, water, and vegetative resources and to provide
maximum feed value by growing suitable grasses and other forages from which animals
graze plant material still connected to its roots.

2. Organic dairy animals, from 12 months of age and up, must consume no less

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than 20% of their daily dry matter intake from pasture for a minimum of 120 calendar days per year, with a maximum stocking rate of three lactating dairy cows per acre.

3. Farms not in compliance with the above should be allowed one year to come into compliance but will need to file an updated and enforceable farm plan, providing for adequate pasture, within 60 days of the publishing of any new pasture guidance document by the USDA.

I urge the NOSB to adopt the Livestock Committee Pasture Recommendation and add the above specificity, making true access to pasture a reality.

Sincerely,

Chad Pawlak, President

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